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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MANSEL OIL LIMITED,

Plaintiff,

-against-

SWIFT AVIATION GROUP, INC.,
Defendant.

08 Civ. 1086 (GBD)

**NOTICE OF MOTION IN
SUPPORT OF MOTION FOR LEAVE TO
FILE AN AMENDED COMPLAINT; TO
ISSUE AMENDED ORDER OF
ATTACHMENT; AND TO ATTACH THE
FUNDS PRESENTLY ATTACHED
PURSUANT TO THE AMENDED ORDER**

PLEASE TAKE NOTICE that upon the annexed Affidavit of LeRoy Lambert ("Lambert Aff."), accompanying Memorandum of Law, and the pleadings and proceedings heretofore had herein, Plaintiff will move this Court in Courtroom 16D located at 500 Pearl Street, New York, New York on the 28th day of April 2008, for Orders granting the following relief:

1. Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, granting Plaintiff leave to file the Verified Amended Complaint in the form annexed as Exhibit A to the Lambert Affidavit;

2. Pursuant to Supplemental Rule B for Admiralty or Maritime Claims, amending the Order of Attachment previously issued by this Court on February 5, 2008 in the amount of \$750,000, in the form annexed as Exhibit C to the Lambert Affidavit; and

3. Pursuant to the holdings and reasoning of *Tide Line, Inc. v. Easttrade*

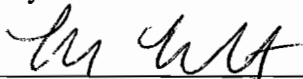
Commodities, Inc., 2006 U.S. Dist LEXIS 95870 (August 15, 2006), *Tide Line, Inc. v. Easttrade Commodities, Inc.*, 2006 U.S. Dist LEXIS 60770 (August 25, 2006), and *Phoenix Bulk Carriers Ltd v. Unicarbond Ltd.*, No. 07 Civ. 10404 (RMB) (S.D.N.Y. February 13, 2008), ordering that any funds presently restrained pursuant to the February 5 Order and any other amounts which may be restrained between now and the time this motion is decided, which have been shall be, and remain attached pending the outcome of this motion and thereafter pursuant to the Amended Order.

Opposition to this motion, if any, shall be made on or before April 21, 2008.

Papers in reply are to be filed on or before April 28, 2008.

Dated: New York, NY
April 7, 2008

BLANK ROME, LLP
Attorneys for Plaintiff

By 
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